

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, California 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
700 Heinz Avenue
Berkeley, CA 94710

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| Project Title: Removal Action Workplan (RAW), Former Quality Dry Cleaning | | |
| Project Address: 214 Western Avenue | City: Petaluma | County: Sonoma |
| Approval Action Under Consideration by DTSC: | | |
| <input checked="" type="checkbox"/> Removal Action Workplan | <input type="checkbox"/> Initial Permit Issuance | <input type="checkbox"/> Permit Re-Issuance |
| <input type="checkbox"/> Corrective Measure Study/Statement of Basis | <input type="checkbox"/> Permit Modification | <input type="checkbox"/> Closure Plan |
| <input type="checkbox"/> Remedial Action Plan | <input type="checkbox"/> Regulations | <input type="checkbox"/> Interim Removal |
| <input type="checkbox"/> Other (specify): | | |
| Statutory Authority: | | |
| <input type="checkbox"/> California H&SC, Chap. 6.5 <input checked="" type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify): | | |

Project Description: The project involves approval of a Removal Action Workplan (RAW) which proposes removing the floor slab at the former dry-cleaning facility and installing a sub-slab depressurization (SSD) system at the former Quality Cleaners located at 214 Western Avenue in the City of Petaluma, California (Site). A vapor barrier will also be installed over the top of the depressurization system and below the new slab. In addition, the project remedy includes a land use covenant (LUC) to prevent the use of groundwater and to restrict the use of the property to commercial use only until such time that unrestricted use screening levels have been achieved. Based on previous investigations conducted at the Site, DTSC determined that the SSD system, vapor barrier, and LUC would mitigate potential risks to human health and the environment from tetrachloroethylene (PCE) in the soil, soil vapor, and groundwater.

Background: The Site consists of a commercial building where a former dry-cleaner once operated. Restaurants are located adjacent to either side of the Site. Additional surrounding businesses include cafes, grocery stores, dry cleaners, gift shops, and art galleries. Historic records indicate that "Petaluma Quick Clean Center" first occupied the building in 1963. It appears that over the years the Site had different names but continued to operate as a dry-cleaning facility through 2010. Historically, dry-cleaning facilities used PCE as the dry-cleaning fluid. Spills and/or leaks over time resulted in the release of PCE to the soil and groundwater beneath the Site. PCE and its daughter product 1,2-dichloroethylene (1,2-DCE) are the only known chemicals of potential concern (COPC) at the Site. Dry cleaning operations have ceased at the Site and PCE is no longer being used at the Site.

Environmental Investigations at the Site were initiated in November 2014 and continued with several consultants and a new owner through 2018. The results of these investigations indicate that PCE impacted soil, soil vapor, groundwater, and indoor air are present at the Site. Sampling of indoor air indicates that concentrations of PCE within the former dry-cleaning facility exceed DTSC screening levels, while the concentration of PCE in the adjacent businesses of the same building is below DTSC screening levels. The investigations also demonstrate that soil and soil vapor impacts are primarily limited to the area of the former dry-cleaning facility and the impacts to groundwater are primarily limited to the footprint of the building.

Project Activities: The removal action outlined in the RAW to address the elevated concentrations of PCE on the Site consists of the following activities:

1. Removal of the floor slab within the former dry-cleaning facility;
2. Installation of the SSD system which consists of a permeable gravel layer with slotted pipes running through it. The slotted pipes are connected together and then connected to an industrial fan or blower. The fan pulls/vacuums the PCE vapors from the permeable gravel layer and passes them through a carbon filter prior to venting to the top of the building;
3. Installation of the vapor barrier which is a plastic like material that seals the floor and prevents PCE vapors from entering through the floor of the building;
4. Replacement of the floor slab;

5. Sampling and analyzing of indoor air to verify that the system is adequately preventing PCE vapors from entering the building and to demonstrate that the building is safe for occupancy;
6. Attachment of a land use covenant to the deed for the property to limit future sensitive uses of the Site and prevent the use of groundwater.

Conveyance piping from the SSD system will be located above ground and inside the building. The vapors from the SSD system will initially be passed through a carbon treatment system and then vented to the roof of the facility. Vapor emissions from the SSD system will be monitored periodically and will comply with the standards specified in Bay Area Air Quality Management District (BAAQMD) Regulation 8, Rule 47, "Air Stripping and Soil Vapor Extraction Operations." Depending on the concentration levels of PCE within the extracted vapors, the system may be required to operate under a BAAQMD permit.

All site activities, including post-implementation monitoring and maintenance will be conducted in accordance with the Site-specific health and safety plan that complies with Title 8, California Code of Regulations Section 5192. The anticipated project start date is summer/fall of 2020, and the construction activities are expected to take about one to two months to complete. The operation and maintenance of the SSD system is anticipated to require 2 to 4 years of operation until active venting can be replaced with passive venting.

The proposed SSD/Vapor Barrier preferred alternative has been demonstrated at similar sites to sufficiently reduce concentrations of PCE in indoor air, and to be protective of human health for commercial use exposure scenarios at the property. Eventually, PCE concentrations may be reduced to levels that would allow for unrestricted use of the property. Until such time as those levels are attained, a LUC will be attached to the deed for the property to limit residential and other sensitive uses of the site, and to prevent the use of groundwater. The current and anticipated future land use for the Site is commercial.

DTSC is overseeing cleanup at the Site under a Voluntary Cleanup Agreement (VCA) signed by the project proponent and DTSC on January 9, 2017 and is proposing to approve the project pursuant to Chapter 6.8, Division 20, section 25355.5(a)(1)(C) of the Health and Safety Code (H&SC).

An analysis of project activities upon existing environmental conditions indicates that implementation of environmental safeguards and monitoring procedures that are enforceable and made a condition of project approval will ensure that impacts to the environment will be less than significant.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: 214 Western LLC

Exempt Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
 Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
 Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
 Categorical Exemption: [CCR Title 14, Sec. 15330]
 Statutory Exemptions: [State Code Section Number]
 Common Sense Exemption [CCR, Sec. 15061(b)(3)]

Exemption Title: Continuation of activities to Prevent, Minimize, Stabilize, Mitigate, or Eliminate the Release or Threat of Release of Hazardous Waste or Hazardous Substance.

Reasons Why Project is Exempt:

1. The project is a minor cleanup action to be taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste and substance.
2. The project is a removal action costing \$1 million or less.
3. The project will not be located on a site which is included on any list compiled pursuant to Cal. Gov. Code § 65962.5 (<http://calepa.ca.gov/sitecleanup/corteselist/>)
4. The project will not have a significant effect on the environment due to unusual circumstances.
5. The project will not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.
6. The project will not cause a substantial adverse change in the significance of a historical resource.
7. The project will not require onsite use of a hazardous waste incinerator or thermal treatment unit.

- 8. The project will not require the relocation of residences or businesses.
- 9. The project will not involve the potential release into the air of volatile organic compounds as defined in Health and Safety Code section 25123.6 (Permits for the SSD system have been obtained from BAAQMD).
- 10. The cumulative impact of successive projects of the same type on the same place, over time, if there are any, will not be significant.
- 11. The project will be consistent with applicable State and local environmental permitting requirements.

Evidence to support the above reasons is documented in the project file record, available for inspection at:

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 Site Mitigation and Restoration Program
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 Berkeley, CA 94710

DTSC EnviroStor website: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002205

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| Nina Bacey | Project Manager | (510) 540-2480 |
| Project Manager | Title | Phone No. |

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|  | | 7/17/2020 |
| Branch Chief's Signature | | Date |

| | | |
|-----------------|--------------|----------------|
| Julie Pettijohn | Branch Chief | (510) 540-3833 |
| Branch Chief | Title | Phone No. |

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: